

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

2 charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

3 davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

4 melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

5 johnneukom@quinnemanuel.com

Jordan Jaffe (Bar No. 254886)

6 jordanjaffe@quinnemanuel.com

50 California Street, 22<sup>nd</sup> Floor

7 San Francisco, California 94111-4788

Telephone: (415) 875-6600

8 Facsimile: (415) 875-6700

9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;  
16 OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER  
IN SUPPORT OF PLAINTIFF WAYMO  
LLC'S ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL ITS OPPOSITION  
TO UBER'S MOTION TO COMPEL RFP  
& ROG RESPONSES, ENFORCE ORDER,  
AND COMPEL 30(B)(6) TESTIMONY**

1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under  
7 Seal information in its August 17, 2017 Opposition to Uber’s Motion to Compel RFP & ROG  
8 Reponses, Enforce Order, and Compel 30(b)(6) Testimony (the “Administrative Motion”). The  
9 Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Portions of Waymo’s August 17, 2017 Opposition to Uber’s Motion to Compel RFP & ROG Reponses, Enforce Order, and Compel 30(b)(6) Testimony	Portions highlighted in green	Waymo

15 3. Portions of Waymo’s Opposition (identified in the table above) contain, discuss, or  
16 refer Waymo’s confidential business information, including descriptions of Waymo’s highly  
17 confidential merger and acquisition activities. Public disclosure of this information to Waymo’s  
18 competitors would harm Waymo by giving its competitors access to Waymo’s highly confidential  
19 internal business activities. Portions of Waymo’s Opposition also identify Waymo employees by  
20 name, and the public disclosure of their identities would cause harm to these individuals and to  
21 Waymo. Waymo’s request to seal is narrowly tailored to only the confidential information.

22 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
23 true and correct, and that this declaration was executed in San Francisco, California, on August 17,  
24 2017.

25 By /s/ Lindsay Cooper  
26 Lindsay Cooper  
27 Attorneys for WAYMO LLC  
28

**SIGNATURE ATTESTATION**

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Lindsay Cooper.

/s/ Charles K. Verhoeven  
Charles K. Verhoeven